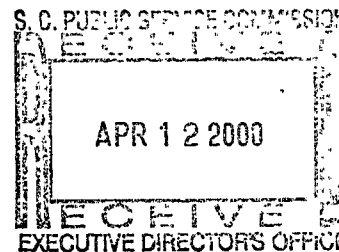


Caroline N. Watson
General Counsel-South Carolina

April 12, 2000

Suite 821
1600 Hampton Street
Columbia, South Carolina 29201
803 748-8700
Fax: 803 254-1731

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211



Re: BellSouth Telecommunications, Inc. Petition to
Establish Geographically Deaveraged Rates for
Unbundled Network Elements and Network Element
Combinations
Docket No.: 2000-0122-C

Dear Mr. Walsh:

Enclosed for filing please find the original and ten copies of the Joint Stipulation of BellSouth, AT&T, and MCI Regarding UNE Deaveraging in the above-referenced matter. It is our understanding through informal discussions that some or all of the other parties in this Docket may be in agreement with this Stipulation and may file evidence of that agreement, possibly avoiding the need for a hearing. At the appropriate time as the Commission may determine, it is requested that the Commission approve the attached Stipulation.

By copy of this letter, I am serving this pleading upon all parties of record.

Sincerely,

Caroline N. Watson

CNW/nml
Enclosure

cc: F. David Butler, Esquire
Elliott F. Elam, Jr., Esquire
John F. Beach, Esquire
Marsha A. Ward, Esquire
Darra W. Cothran, Esquire
Frank R. Ellerbe, Esquire
Mitchell M. Willoughby, Esquire
Francis P. Mood, Esquire

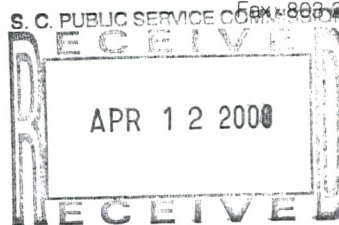
APR 12 2000
OFFICE OF GENERAL COUNSEL
SOUTH CAROLINA PUBLIC
SERVICE COMMISSION

Caroline N. Watson
General Counsel-South Carolina

April 12, 2000

Suite 821
1600 Hampton Street
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803 748-8700
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The Honorable Gary E. Walsh
Executive Director
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By copy of this letter, I am serving this pleading upon all parties of record.

Sincerely,

A handwritten signature in cursive script that reads "CN Watson".

Caroline N. Watson

CNW/nml

Enclosure

cc: F. David Butler, Esquire
Elliott F. Elam, Jr., Esquire
John F. Beach, Esquire
Marsha A. Ward, Esquire
Darra W. Cothran, Esquire
Frank R. Ellerbe, Esquire
Mitchell M. Willoughby, Esquire
Francis P. Mood, Esquire



BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

POSTED
Docket No. 2000-122-C

In re:

PROCEEDING FOR BELL SOUTH
TELECOMMUNICATIONS, INC. TO
ESTABLISH GEOGRAPHICALLY
DEAVERAGED RATES FOR UNBUNDLED
NETWORK ELEMENTS AND NETWORK
ELEMENT COMBINATIONS

Docket No. 2000 - 0122 - C



JOINT STIPULATION REGARDING UNE DEAVERAGING

THIS JOINT STIPULATION ("Stipulation") is entered into by and among the following parties ("Parties"): BellSouth Telecommunications, Inc. ("BellSouth"); AT&T Communications of the Southern States, Inc. ("AT&T"); and MCI WorldCom Network Services, Inc. ("MCIW").

WHEREAS, the Federal Communications Commission ("FCC") has announced that its stay of Rule 51.507(f) (the FCC's "Deaveraging Rule") will be lifted effective six months from the date of the release of its Order Regarding New Mechanism for Federal Universal Service High Cost Support Provided to Non-Rural Carriers (CC Docket No. 96-45), which Order was released November 2, 1999, thus lifting the stay of the FCC's Deaveraging Rule on May 1, 2000; and

WHEREAS, the FCC's Deaveraging Rule provides in part that "State commissions shall establish different rates for elements in at least three defined geographic areas within the state to reflect geographic cost differences"; and

WHEREAS, the Parties do not believe that it is possible to conclude a proceeding to establish permanent cost-based deaveraged unbundled network element ("UNE") rates in South Carolina by the date the stay of the FCC's Deaveraging Rule is lifted; and

RETURN DATE: ML DB
SERVICE: OK DB

WHEREAS, the Parties are willing to agree and stipulate to a plan for UNE rate deaveraging to avoid the necessity for the Public Service Commission of South Carolina ("Commission") to seek a waiver of the FCC's Deaveraging Rule; and

WHEREAS, this Stipulation is the result of a compromise agreement reached between the Parties in order to accommodate the pending FCC deadline, and is not intended to set a precedent for the resolution of any issue related to UNE rates in this or any other proceeding.

NOW THEREFORE, the Parties agree as follows:

1. This Stipulation establishes deaveraged UNE rates and rates for certain UNE combinations (hereinafter collectively referred to as "deaveraged UNE rates") for BellSouth in South Carolina, which are set forth in Attachment A to this Stipulation. The rates set forth in Attachment A are based on the statewide average rates established by the Commission's June 1, 1998, Order No. 98-214 in Docket No. 97-374-C.
2. The deaveraged UNE rates in this Stipulation will take effect on May 1, 2000 (unless the effective date of the lifting of the stay of the FCC's Deaveraging Rule is changed by the FCC or court of competent jurisdiction, in which case the revised date established will control). These rates will remain in effect until they are replaced by permanent deaveraged UNE rates established in this or any other Commission proceeding. The deaveraged UNE rates in this Stipulation will be available to parties that have an interconnection agreement with BellSouth. As between the Parties who are signatories to this Stipulation, the above-mentioned effective dates shall have the effect of a Commission order and will not be delayed pending formal amendment of the Parties' individual interconnection agreements. The deaveraged UNE rates in this Stipulation will not be subject to true-up in the event such rates are replaced by permanent rates resulting from this or any other Commission proceeding.

3. Nothing in this Stipulation shall establish any precedent for the Commission's resolution of any issue in this proceeding or in any other proceeding addressing the issue of UNE rates. In any proceeding before the Commission, each Party is free to advocate any position with respect to all such matters pertaining to the issue of UNE rates.

4. This Stipulation will be submitted to the Commission for approval as soon as it is executed by the Parties.

5. If this Stipulation is not accepted by the Commission in its entirety and without modification, it shall have no further force and effect and shall not be admissible for any purpose in any further proceedings in this docket, any appeal or other judicial proceedings related to this docket, or any future judicial or regulatory proceedings.

6. Each Party agrees that if this Stipulation is approved, it will not challenge in any forum: (i) the deaveraged UNE rates set forth in Attachment A, (ii) the period during which the rates are in effect, or (iii) the absence of deaveraged UNE rates for any elements not included on Attachment A. This Stipulation does not affect or prejudice the position of any party in any pending judicial or administrative proceeding relating to the level of any existing average or deaveraged loop rate and/or the appropriateness of the cost methodology used to establish any such rate. Nothing in this Stipulation shall prevent any party from pursuing or opposing, at any time, in any proceeding, any issues concerning universal service funding, rate rebalancing, recovery of stranded costs, or other actions which may impact UNE and retail rates.

IN WITNESS WHEREOF, the parties have executed this Stipulation on the dates set forth next to their respective signatures.

ATTACHMENT A
Page 1 of 2SOUTH CAROLINA
PROPOSED DEAVERAGED RATES FOR UNE LOOPS AND COMBINATIONS

UNE LOOPS (Recurring Rates)	Statewide Loop Rate	Zone 1	Zone 2	Zone 3
2-wire analog voice grade loop - service level 1	\$ 22.49	\$ 18.48	\$ 27.87	\$ 36.91
2-wire analog voice grade loop - service level 2	\$ 26.25	\$ 21.57	\$ 32.53	\$ 43.08
4-wire analog voice grade loop	\$ 35.86	\$ 29.47	\$ 44.44	\$ 58.85
2-wire ISDN digital grade loop	\$ 32.47	\$ 26.68	\$ 40.24	\$ 53.29
2-wire asymmetrical digital subscriber line (ADSL) compatible loop	\$ 20.81	\$ 17.10	\$ 25.79	\$ 34.15
2-wire high bit rate digital subscriber line (HDSL) compatible loop	\$ 14.86	\$ 12.21	\$ 18.41	\$ 24.39
4-wire high bit rate digital subscriber line (HDSL) compatible loop	\$ 19.73	\$ 16.21	\$ 24.45	\$ 32.38
4-wire DS1 digital loop	\$ 72.55	\$ 59.61	\$ 89.90	\$ 119.06
4-wire 56 or 64 Kbps digital grade loop	\$ 41.70	\$ 34.26	\$ 51.67	\$ 68.43
UNE COMBINATIONS (Recurring and Non-Recurring Rates)	Statewide Combination Rate	Zone 1	Zone 2	Zone 3
Loop/Port				
2-wire analog voice grade loop/SL1 and port, Recurring	\$ 24.40	\$ 20.71	\$ 29.35	\$ 37.68
2-wire voice grade loop	\$ 20.71	\$ 17.02	\$ 25.66	\$ 33.99
2-wire port	\$ 3.69	\$ 3.69	\$ 3.69	\$ 3.69
NR-Installation and Disconnect-Electronic-First	\$ 1.59			
NR-Installation and Disconnect-Electronic-Additional	\$ 0.40			
NR-Installation and Disconnect-Manual-First	\$ 43.19			
NR-Installation and Disconnect-Manual-Additional	\$ 9.91			
NR-Subsequent database update - Electronic	\$ 0.71			
NR-Subsequent database update - Manual	\$ 9.62			
Enhanced Extended Loops (EELs)				
2-wire analog voice grade loop SL2 and DS1 ded interoffice transport with channelization ¹				
Fixed 1st circuit in DS1, Recurring	\$ 269.48	\$ 264.80	\$ 275.76	\$ 286.31
2-wire voice grade loop	\$ 26.25	\$ 21.57	\$ 32.53	\$ 43.08
DS1 facility termination	\$ 94.98	\$ 94.98	\$ 94.98	\$ 94.98
DS1 system	\$ 146.49	\$ 146.49	\$ 146.49	\$ 146.49
Voice grade plug-in	\$ 1.76	\$ 1.76	\$ 1.76	\$ 1.76
Interoffice transport - ded - DS1 per mile, Recurring	\$ 0.7598	\$ 0.7598	\$ 0.7598	\$ 0.7598
Per additional circuit in same DS1, Recurring	\$ 28.01	\$ 23.33	\$ 34.29	\$ 44.84
2-wire voice grade loop	\$ 26.25	\$ 21.57	\$ 32.53	\$ 43.08
Voice grade plug-in	\$ 1.76	\$ 1.76	\$ 1.76	\$ 1.76
NR-Installation and Disconnect-Electronic-First	\$ 25.31			
NR-Installation and Disconnect-Electronic-Additional	\$ 24.79			
NR-Installation and Disconnect-Manual-First	\$ 81.85			
NR-Installation and Disconnect-Manual-Additional	\$ 43.81			
4-wire analog voice grade loop and DS1 ded interoffice transport with channelization ¹				
Fixed 1st circuit in DS1, Recurring	\$ 280.53	\$ 274.14	\$ 289.11	\$ 303.52
4-wire voice grade loop	\$ 35.86	\$ 29.47	\$ 44.44	\$ 58.85
DS1 facility termination	\$ 94.98	\$ 94.98	\$ 94.98	\$ 94.98
DS1 system	\$ 146.49	\$ 146.49	\$ 146.49	\$ 146.49
Voice grade plug-in	\$ 3.20	\$ 3.20	\$ 3.20	\$ 3.20
Interoffice transport - ded - DS1 per mile, Recurring	\$ 0.7598	\$ 0.7598	\$ 0.7598	\$ 0.7598
Per additional circuit in same DS1, Recurring	\$ 39.06	\$ 32.67	\$ 47.64	\$ 62.05
4-wire voice grade loop	\$ 35.86	\$ 29.47	\$ 44.44	\$ 58.85
Voice grade plug-in	\$ 3.20	\$ 3.20	\$ 3.20	\$ 3.20
NR-Installation and Disconnect-Electronic-First	\$ 25.31			
NR-Installation and Disconnect-Electronic-Additional	\$ 24.79			
NR-Installation and Disconnect-Manual-First	\$ 81.85			
NR-Installation and Disconnect-Manual-Additional	\$ 43.81			
DS0 digital 56 or 64 kbps loop and DS1 ded interoffice transport with channelization ¹				
Fixed 1st circuit in DS1, Recurring	\$ 286.37	\$ 278.93	\$ 296.34	\$ 313.10
DS0 56 or 64 kbps loop	\$ 41.70	\$ 34.26	\$ 51.67	\$ 68.43
DS1 facility termination	\$ 94.98	\$ 94.98	\$ 94.98	\$ 94.98
DS1 system	\$ 146.49	\$ 146.49	\$ 146.49	\$ 146.49
Voice grade plug-in	\$ 3.20	\$ 3.20	\$ 3.20	\$ 3.20
Interoffice transport - ded - DS1 per mile, Recurring	\$ 0.7598	\$ 0.7598	\$ 0.7598	\$ 0.7598
Per additional circuit in same DS1, Recurring	\$ 44.90	\$ 37.46	\$ 54.87	\$ 71.63
DS0 56 or 64 kbps loop	\$ 41.70	\$ 34.26	\$ 51.67	\$ 68.43
Voice grade plug-in	\$ 3.20	\$ 3.20	\$ 3.20	\$ 3.20
NR-Installation and Disconnect-Electronic-First	\$ 25.31			
NR-Installation and Disconnect-Electronic-Additional	\$ 24.79			
NR-Installation and Disconnect-Manual-First	\$ 81.85			
NR-Installation and Disconnect-Manual-Additional	\$ 43.81			
DS1 digital loop and DS1 ded interoffice transport ¹				
Fixed, Recurring	\$ 167.53	\$ 154.59	\$ 184.88	\$ 214.04
DS1 loop	\$ 72.55	\$ 59.61	\$ 89.90	\$ 119.06
DS1 facility termination	\$ 94.98	\$ 94.98	\$ 94.98	\$ 94.98
Interoffice transport - ded - DS1 per mile, Recurring	\$ 0.7598	\$ 0.7598	\$ 0.7598	\$ 0.7598
NR-Installation and Disconnect-Electronic-First	\$ 25.31			
NR-Installation and Disconnect-Electronic-Additional	\$ 24.79			
NR-Installation and Disconnect-Manual-First	\$ 81.85			
NR-Installation and Disconnect-Manual-Additional	\$ 43.81			

ATTACHMENT A


Page 2 of 2

SC Wire Centers	UNE Zones
BATHSCMA	1
BHSSCMA	1
BLRGSCMA	1
CHAPSCCL	1
CHTNSCDP	1
CHTNSCDT	1
CHTNSCJM	1
CHTNSCJN	1
CHTNSCLB	1
CHTNSCNO	1
CHTNSCWA	1
CLMASCAR	1
CLMASCCH	1
CLMASCDF	1
CLMASCPA	1
CLMASCSA	1
CLMAS CSC	1
CLMASCSH	1
CLMASCSN	1
CLMASCSU	1
CLMASCSW	1
EOVRSCMA	1
ESLYSCMA	1
FLBHSCMA	1
FNINSCES	1
GNVLS CBE	1
GNVLS CCH	1
GNVLSCCR	1
GNVLS CDT	1
GNVLS CWE	1
GNVLS CWP	1
GNVLS CWR	1
GRERSCMA	1
ISPLSCIS	1
MNPLSCES	1
MRTTSCMA	1
NAGSSCMA	1
PDMTSCES	1
SBRKSCSK	1

SC Wire Centers (cont'd)	UNE Zones (cont'd)
SUVLSCMA	1
TRRSSCMA	1
WCLMSCMA	1
FLRNSCMA	1
FNVLSCMA	1
LYMNSCES	1
LYMNSCIP	1
SPBGSCBS	1
SPBGSCCV	1
SPBGSCHW	1
SPBGSCMA	1
SPBGSCWV	1
AIKNSCMA	2
ARSNSCAH	2
ARSNSCMA	2
ARSNSCTV	2
BETNSCMA	2
CLVRSCES	2
CWPNSCMA	2
DRTNSCMA	2
GIVLSCMA	2
HNP HSCMA	2
HTVLSCMA	2
LKWLSCRS	2
MARNSCBN	2
MARNSCMA	2
MLNSSCWP	2
PCLTSCES	2
PNTNSCMA	2
SCHLSCES	2
TMVLSCMA	2
WMTNSCPW	2
YORKSCMA	2
BMBRSCMA	2
CENTSCWS	2
CLSNSCMA	2
LBRTSCMA	2
NWELSCMA	2
ORBGSCMA	2
PCKNSCES	2

SC Wire Centers (cont'd)	UNE Zones (cont'd)
SENCSCMA	2
SXMLSCMA	2
TKNAS CST	2
BLBGSCMA	3
CLTNSCMA	3
CMDNSCLG	3
CMDNSCMA	3
GFNYSCMA	3
NWBYSCMA	3
SALMSCMA	3
WLHLSCES	3
WMNSSCES	3
ALDLSCMA	3
BAVLSCMA	3
BEVLSCMA	3
BLNHSCMA	3
BRWLSCBE	3
BTBGSCMA	3
CHRWSCES	3
CLIOSCMA	3
DLLNSCMA	3
DNMKSCES	3
HCGVSCMA	3
JHTNSCMA	3
JNVLSCMA	3
JONNSCES	3
LATTSCLS	3
LKVWSCMA	3
MCCLSCMA	3
PRSRSCMA	3
SHRNSCMA	3
UNINSCMA	3
WHTMSCMA	3
EDBHSCMA	3
EDFDSCMA	3
SPFDSCMA	3
STGRSCMA	3

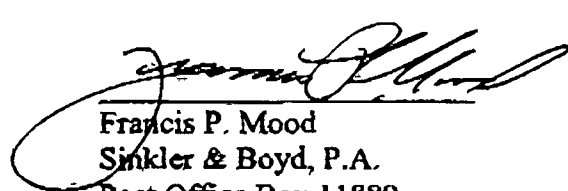
SIGNED THIS ____ DAY OF APRIL, 2000.



Caroline N. Watson
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Post Office Box 752
Columbia, South Carolina 29202

Bennett L. Ross
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BellSouth Telecommunications, Inc.


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Woodward, Cothran & Herndon

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Post Office Box 12399

Columbia, South Carolina 29211

Kennard B. Woods

MCI WorldCom

LAW AND PUBLIC POLICY

Concourse Corporate Center Six

6 Concourse Parkway, Suite 3200

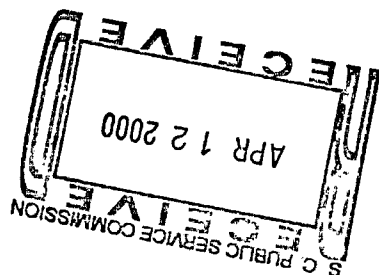
Atlanta, Georgia 30328

Counsel for MCI WorldCom, Inc.

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
 COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Joint Stipulation Regarding UNE Deaveraging to be served by placing such in the care and custody of the United States Postal Service, with first-class postage affixed thereto and addressed to the following this April 12, 2000:

F. David Butler, Esquire
 General Counsel
 S. C. Public Service Commission
 ✓ Post Office Box 11649
 Columbia, South Carolina 29211
 (PSC)



Elliott F. Elam, Jr.
 Department of Consumer Affairs
 ✓ 3600 Forest Drive
 Suite 300
 Post Office Box 5757
 Columbia, South Carolina 29250-5757
 (Consumer Advocate)

John F. Beach, Esquire
 John J. Pringle, Jr., Esquire
 1321 Lady Street, Suite 310
 ✓ Post Office Box 11547
 Columbia, South Carolina 29211-1547
 (TriVergent Communications)

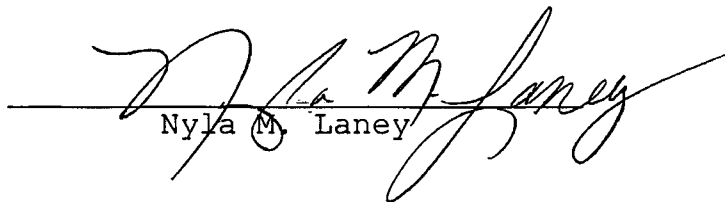
Marsha A. Ward
 Kennard B. Woods
 ✓ MCI WorldCom, Inc.
 Law and Public Policy
 6 Concourse Parkway, Suite 3200
 Atlanta, GA 30328
 (MCI)

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 1426 Main Street, Suite 1200
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 Nyla M. Laney